

# **Exhibit 10**

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**From:** Richard S. Cornfeld <rick@ghalaw.com>  
**Sent:** Wednesday, October 25, 2023 2:45 PM  
**To:** Mueller, Nicole C.  
**Cc:** Anthony Jenkins; Wylie, Joseph  
**Subject:** RE: Compass Discovery Requests to Plaintiffs Baldwin and Borrero

**This Message Is From an External Sender**

This message came from outside your organization.

Nicole, we have been trying to obtain his records, but we have been unable to. It looks like we are going to have to subpoena them.

As required by Rul 45, we'll provide you with a copy of the subpoena before we serve it.

In the meantime, we can provide his interrogatory answers explaining that if you insist, but that doesn't seem fruitful.

I assume you don't want to take his dep without the records. So please give us another thirty days.

Rick

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**From:** Mueller, Nicole C. <Nicole.Mueller@klgates.com>  
**Sent:** Wednesday, October 25, 2023 7:41 AM  
**To:** Richard S. Cornfeld <rick@ghalaw.com>  
**Cc:** Anthony Jenkins <anthony@aswtlawyers.com>; Wylie, Joseph <joseph.wylie@klgates.com>  
**Subject:** RE: Compass Discovery Requests to Plaintiffs Baldwin and Borrero

Rick and Anthony,

The one-month extension that we agreed to provide for Mr. Borrero's discovery requests in July was contingent upon both documents and a deposition date being provided along with the discovery responses in August. We are nearing the end of October. Please advise as to when we can receive to expect these materials.

Nicole

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**From:** Richard S. Cornfeld <[rick@ghalaw.com](mailto:rick@ghalaw.com)>  
**Sent:** Friday, September 1, 2023 4:03 PM  
**To:** Mueller, Nicole C. <[Nicole.Mueller@klgates.com](mailto:Nicole.Mueller@klgates.com)>  
**Cc:** Anthony Jenkins <[anthony@aswtlawyers.com](mailto:anthony@aswtlawyers.com)>; Wylie, Joseph <[joseph.wylie@klgates.com](mailto:joseph.wylie@klgates.com)>  
**Subject:** RE: Compass Discovery Requests to Plaintiffs Baldwin and Borrero

**External Sender:**

Nicole, I understand. We need the bank records to answer the interrogatories. I expect to speak to him tomorrow about that and about a dep date.

Have a great holiday weekend,

Rick

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**From:** Mueller, Nicole C. <[Nicole.Mueller@klgates.com](mailto:Nicole.Mueller@klgates.com)>  
**Sent:** Thursday, August 31, 2023 11:19 AM  
**To:** Richard S. Cornfeld <[rick@ghalaw.com](mailto:rick@ghalaw.com)>  
**Cc:** Anthony Jenkins <[anthony@aswtlawyers.com](mailto:anthony@aswtlawyers.com)>; Wylie, Joseph <[joseph.wylie@klgates.com](mailto:joseph.wylie@klgates.com)>  
**Subject:** RE: Compass Discovery Requests to Plaintiffs Baldwin and Borrero

Rick,

In addition to the bank statements, Mr. Borrero is overdue on providing his responses to the interrogatories and document requests that we served on June 16 and dates for which he is available to sit for his deposition. Please advise as to when we can expect to receive these items.

Nicole

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**From:** Richard S. Cornfeld <[rick@ghalaw.com](mailto:rick@ghalaw.com)>  
**Sent:** Tuesday, August 29, 2023 8:05 PM  
**To:** Mueller, Nicole C. <[Nicole.Mueller@klgates.com](mailto:Nicole.Mueller@klgates.com)>; Anthony Jenkins <[anthony@aswtlawyers.com](mailto:anthony@aswtlawyers.com)>  
**Cc:** Wylie, Joseph <[joseph.wylie@klgates.com](mailto:joseph.wylie@klgates.com)>  
**Subject:** Re: Compass Discovery Requests to Plaintiffs Baldwin and Borrero

Nicole, we've been working on trying to get his bank records, and now with the hurricane headed to Florida, it'll take a few more days. We'll keep you posted.

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**From:** Mueller, Nicole C. <[Nicole.Mueller@klgates.com](mailto:Nicole.Mueller@klgates.com)>  
**Date:** Tuesday, August 29, 2023 at 11:55 AM  
**To:** Anthony Jenkins <[anthony@aswtlawyers.com](mailto:anthony@aswtlawyers.com)>  
**Cc:** Wylie, Joseph <[joseph.wylie@klgates.com](mailto:joseph.wylie@klgates.com)>, Richard S. Cornfeld <[rick@ghalaw.com](mailto:rick@ghalaw.com)>  
**Subject:** RE: Compass Discovery Requests to Plaintiffs Baldwin and Borrero

Hi Anthony,

What's the status on Borrero's discovery? We're waiting on his responses, documents, and a date for his deposition.

Thanks,  
Nicole

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**From:** Anthony Jenkins <[anthony@aswtlawyers.com](mailto:anthony@aswtlawyers.com)>  
**Sent:** Friday, August 18, 2023 4:50 PM  
**To:** Mueller, Nicole C. <[Nicole.Mueller@klgates.com](mailto:Nicole.Mueller@klgates.com)>  
**Cc:** Wylie, Joseph <[joseph.wylie@klgates.com](mailto:joseph.wylie@klgates.com)>; Richard S. Cornfeld <[rick@ghalaw.com](mailto:rick@ghalaw.com)>  
**Subject:** RE: Compass Discovery Requests to Plaintiffs Baldwin and Borrero

Nicole, all of that is agreed to, thx for the extra week on Borrero.

BR,

Anthony  
714.675.1258

ANTHONY JENKINS | [ARIAS SANGUINETTI](#) | (310) 844-9696

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**From:** Mueller, Nicole C. <[Nicole.Mueller@klgates.com](mailto:Nicole.Mueller@klgates.com)>  
**Sent:** Friday, August 18, 2023 2:46 PM  
**To:** Anthony Jenkins <[anthony@aswtlawyers.com](mailto:anthony@aswtlawyers.com)>  
**Cc:** Wylie, Joseph <[joseph.wylie@klgates.com](mailto:joseph.wylie@klgates.com)>; Richard S. Cornfeld <[rick@ghalaw.com](mailto:rick@ghalaw.com)>  
**Subject:** RE: Compass Discovery Requests to Plaintiffs Baldwin and Borrero

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Thanks, Anthony.

Let's plan on October 3 for Mr. Baldwin's deposition, provided that, in the event that the Baldwin matter is ultimately consolidated into the Moore matter, plaintiffs will not object to the taking of the deposition or any subsequent use of the transcript as having occurred outside the fact discovery period. I also want to be clear that should Mr. Baldwin obtain his the bank statements *after* the deposition, we will likely want to depose him again. The deposition will be in person.

For Borrero, a one week extension is fine.

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**From:** Anthony Jenkins <[anthony@aswtlawyers.com](mailto:anthony@aswtlawyers.com)>  
**Sent:** Friday, August 18, 2023 4:33 PM  
**To:** Mueller, Nicole C. <[Nicole.Mueller@klgates.com](mailto:Nicole.Mueller@klgates.com)>  
**Cc:** Wylie, Joseph <[joseph.wylie@klgates.com](mailto:joseph.wylie@klgates.com)>; Richard S. Cornfeld <[rick@ghalaw.com](mailto:rick@ghalaw.com)>  
**Subject:** RE: Compass Discovery Requests to Plaintiffs Baldwin and Borrero

Nicole,

- Baldwin is reviewing his answers now and you'll have his verified responses soon. I've attached the final draft, which I don't expect will change, but maybe, I'll know soon, we went over them already, just waiting for the docu-signed verifications.
- He doesn't have any docs—his responses identify the banks he used to use and that he will be requesting copies of his bank statements
- Does Oct 3, 4 or 5 work for his depo? I picked days in Oct because Sep is pretty busy

Can I get a one week extension on Borrero?

BR,  
Anthony  
714.675.1258

ANTHONY JENKINS | [ARIAS SANGUINETTI](#) | (310) 844-9696

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**From:** Anthony Jenkins  
**Sent:** Thursday, August 17, 2023 1:51 PM  
**To:** Mueller, Nicole C. <[Nicole.Mueller@klgates.com](mailto:Nicole.Mueller@klgates.com)>  
**Cc:** Wylie, Joseph <[joseph.wylie@klgates.com](mailto:joseph.wylie@klgates.com)>; Richard S. Cornfeld <[rick@ghalaw.com](mailto:rick@ghalaw.com)>  
**Subject:** RE: Compass Discovery Requests to Plaintiffs Baldwin and Borrero

Nicole,

Re Baldwin

- I'm pretty much on track to get his response and proposed depo dates to you by tomorrow
- But it's my understanding he needs to get copies of his bank statements for the debit card he used, he no longer has that card
- I'll get you those docs as soon as I get them

Re Borrero

- I am requesting one more week to serve his responses, docs and proposed depo dates
- That would make everything due Aug 25
- Please let me know if you agree to the extension

BR,  
Anthony  
714.675.1258

ANTHONY JENKINS | [ARIAS SANGUINETTI](#) | (310) 844-9696

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**From:** Anthony Jenkins  
**Sent:** Wednesday, July 19, 2023 9:32 AM  
**To:** Mueller, Nicole C. <[Nicole.Mueller@klgates.com](mailto:Nicole.Mueller@klgates.com)>  
**Cc:** Wylie, Joseph <[joseph.wylie@klgates.com](mailto:joseph.wylie@klgates.com)>  
**Subject:** RE: Compass Discovery Requests to Plaintiff Baldwin

Nicole, we're on the same page. Thx, greatly appreciated.

ANTHONY JENKINS | [ARIAS SANGUINETTI](#) | (310) 844-9696

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**From:** Mueller, Nicole C. <[Nicole.Mueller@klgates.com](mailto:Nicole.Mueller@klgates.com)>  
**Sent:** Wednesday, July 19, 2023 8:28 AM  
**To:** Anthony Jenkins <[anthony@aswtlawyers.com](mailto:anthony@aswtlawyers.com)>  
**Cc:** Wylie, Joseph <[joseph.wylie@klgates.com](mailto:joseph.wylie@klgates.com)>  
**Subject:** RE: Compass Discovery Requests to Plaintiff Baldwin

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Anthony,

Yes, it does, but that the discovery requests are modeled after the discovery requests issued to the plaintiffs in the Moore action. Those plaintiffs ultimately provided substantive responses and documents and I don't believe the parties had disputes that remain unresolved or that required the Court's attention. I don't expect there to be much in the way

of dispute but, if you disagree once you begin preparing your responses, I'd appreciate knowing that sooner rather than later.

Best,  
Nicole

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**From:** Anthony Jenkins <[anthony@aswtlawyers.com](mailto:anthony@aswtlawyers.com)>  
**Sent:** Tuesday, July 18, 2023 6:55 PM  
**To:** Mueller, Nicole C. <[Nicole.Mueller@klgates.com](mailto:Nicole.Mueller@klgates.com)>  
**Subject:** RE: Compass Discovery Requests to Plaintiff Baldwin

Nicole, agreed. Thx again. So there's no misunderstanding, the extension to respond includes objections right? Please let me know. Thx.

ANTHONY JENKINS | [ARIAS SANGUINETTI](#) | (310) 844-9696

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**From:** Mueller, Nicole C. <[Nicole.Mueller@klgates.com](mailto:Nicole.Mueller@klgates.com)>  
**Sent:** Tuesday, July 18, 2023 12:57 PM  
**To:** Conklin, Michelle R. <[Michelle.Conklin@klgates.com](mailto:Michelle.Conklin@klgates.com)>; [mchappell@csa-law.com](mailto:mchappell@csa-law.com); [gnewman@csa-law.com](mailto:gnewman@csa-law.com); Richard S. Cornfeld <[rick@ghalaw.com](mailto:rick@ghalaw.com)>; Daniel S. Levy <[daniel@ghalaw.com](mailto:daniel@ghalaw.com)>; Robert M. Partain <[robert@aswtlawyers.com](mailto:robert@aswtlawyers.com)>; Mike Arias <[mike@aswtlawyers.com](mailto:mike@aswtlawyers.com)>; Craig S. Momita <[craig@aswtlawyers.com](mailto:craig@aswtlawyers.com)>; Anthony Jenkins <[anthony@aswtlawyers.com](mailto:anthony@aswtlawyers.com)>  
**Cc:** Brotman, Kenn <[kenn.brotman@klgates.com](mailto:kenn.brotman@klgates.com)>; Wylie, Joseph <[joseph.wylie@klgates.com](mailto:joseph.wylie@klgates.com)>  
**Subject:** RE: Compass Discovery Requests to Plaintiff Baldwin

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Anthony,

Following up on our conversation from earlier this afternoon, Compass agrees to extend the time to respond to the discovery requests served on Mr. Baldwin and Mr. Borrero by 30 days on the condition that you produce their responsive documents and provide proposed deposition dates at the same time.

Best regards,  
Nicole

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**From:** Mueller, Nicole C.  
**Sent:** Tuesday, July 18, 2023 10:33 AM  
**To:** Conklin, Michelle R. <[Michelle.Conklin@klgates.com](mailto:Michelle.Conklin@klgates.com)>; [mchappell@csa-law.com](mailto:mchappell@csa-law.com); [gnewman@csa-law.com](mailto:gnewman@csa-law.com); Richard S. Cornfeld <[rick@ghalaw.com](mailto:rick@ghalaw.com)>; Daniel S. Levy <[daniel@ghalaw.com](mailto:daniel@ghalaw.com)>; Robert M. Partain <[robert@aswtlawyers.com](mailto:robert@aswtlawyers.com)>; Mike Arias <[mike@aswtlawyers.com](mailto:mike@aswtlawyers.com)>; Craig S. Momita <[craig@aswtlawyers.com](mailto:craig@aswtlawyers.com)>; Anthony Jenkins <[anthony@aswtlawyers.com](mailto:anthony@aswtlawyers.com)>  
**Cc:** Brotman, Kenn <[kenn.brotman@klgates.com](mailto:kenn.brotman@klgates.com)>; Wylie, Joseph <[joseph.wylie@klgates.com](mailto:joseph.wylie@klgates.com)>  
**Subject:** RE: Compass Discovery Requests to Plaintiff Baldwin

Counsel,

Discovery requests were served on Mr. Baldwin on June 14 and due July 14, 2023. Please advise.

Best regards,  
Nicole



**Nicole C. Mueller** (she/her/hers)

Partner  
K&L Gates LLP  
70 West Madison  
Suite 3100  
Chicago, Illinois 60602  
Phone: (312) 807-4341  
Fax: (312) 345-9976  
[nicole.mueller@klgates.com](mailto:nicole.mueller@klgates.com)  
[www.klgates.com](http://www.klgates.com)



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**From:** Conklin, Michelle R. <[Michelle.Conklin@klgates.com](mailto:Michelle.Conklin@klgates.com)>

**Sent:** Wednesday, June 14, 2023 9:55 AM

**To:** [mchappell@csa-law.com](mailto:mchappell@csa-law.com); [gnewman@csa-law.com](mailto:gnewman@csa-law.com); Richard S. Cornfeld <[rick@ghalaw.com](mailto:rick@ghalaw.com)>; Daniel S. Levy <[daniel@ghalaw.com](mailto:daniel@ghalaw.com)>; Robert M. Partain <[robert@aswtlawyers.com](mailto:robert@aswtlawyers.com)>

**Cc:** Brotman, Kenn <[kenn.brotman@klgates.com](mailto:kenn.brotman@klgates.com)>; Mueller, Nicole C. <[Nicole.Mueller@klgates.com](mailto:Nicole.Mueller@klgates.com)>; Wylie, Joseph <[joseph.wylie@klgates.com](mailto:joseph.wylie@klgates.com)>

**Subject:** Compass Discovery Requests to Plaintiff Baldwin

Counsel:

Please find attached Compass's discovery requests to Plaintiff Brian Baldwin.

Best,  
Michelle



**Michelle R Conklin**

Associate Attorney  
K&L Gates LLP  
70 W Madison  
Suite 3100  
Chicago, IL 60602  
Phone: 312-807-4309  
[michelle.conklin@klgates.com](mailto:michelle.conklin@klgates.com)  
[www.klgates.com](http://www.klgates.com)

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